



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Stainless Works, Streetsboro, OH

FROM: Carlo Demma, Physical Scientist (Env.)
AECAB (MN/OH)

THRU: Brian Dickens, Section Supervisor
AECAB (MN/OH)

TO: File

BASIC INFORMATION

Facility Name: Stainless Works; d.b.a. MetalFab Group; d.b.a. Reaper Offroad

Facility Location: 10145 Philipp Parkway, Streetsboro Ohio

Date of Inspection: November 21, 2022

EPA Inspector(s):

1. Carlo Demma, Environmental Scientist
2. Brianna Fenzl, Environmental Engineer

Other Attendees:

1. Greg Fuller, President of Stainless Works / MetalFab Group / Reaper Offroad
2. Jason Snyder, Vice President of Stainless Works / MetalFab Group / Reaper Offroad

Contact Email Address: greg@stainlessworks.net

Purpose of Inspection: Determine compliance with the CAA's prohibition on tampering and aftermarket defeat devices and determine potential to emit hazardous air pollutants and assess if air permits may be required.

Facility Type: Automotive and miscellaneous metal parts manufacturer.

Regulations Central to Inspection: Emissions Control Tampering prohibitions, CAA Section 203(a)(3)(a)-(b) and Title V Major Source Thresholds of the CAA.

Arrival Time: 2:00 PM EST

Departure Time: 4:15 PM EST

Inspection Type:

☒ Unannounced Inspection

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection
- ☒ Provided Small Business Resource Information Sheet
- ☒ Provided CBI warning to facility

The following information was obtained verbally from Greg Fuller and Jason Snyder unless otherwise noted.

Company Ownership: Stainless Works is a manufacturer of automotive exhaust systems and operates MetalFab Group and Reaper Offroad. MetalFab Group is an order-based miscellaneous metal fabricator. Reaper Offroad is an aftermarket automotive manufacturer of bumper fascia. The entities are located in one building and are owned and operated by Stainless Works. For the purposes of this report, the entities will be collectively referred to as “Stainless Works”.

Process Description:

Stainless Works (SW) creates aftermarket exhausts, aftermarket bumpers, and various other fabricated metal products. The T-304 stainless steel exhausts are built from long tubes that are bent, cut to size, and then welded together. Most of the products that are created at the facility are made with the combination of automation and nonautomated processes (i.e., by hand). SW has several welding booths where employees weld the pipes together and perform finishing processes to the metal products. Finishing processes include de-burring, angle grinding, spot welding and polishing. The bumpers are created by cutting and bending large pieces of stainless sheet metal. SW then applies a coating the newly fabricated bumper parts with primer, wet color basecoat, and a powder coat. The bumpers are then placed into a curing oven to speed up the drying process. SW also creates various metal fabricated custom products on per-customer order basis for a variety of industries such as, Aerospace, Automotive, Food Service, and Construction.

Staff Interview: The new 52,000 square feet facility was recently purchased in 2019. Since then, the company has invested heavily in new automated machinery to expand the quantity of metal fabricated items it creates. The company disclosed that the recently acquired several new large-scale automated machines that perform cutting, bending, and welding. SW stated that every exhaust it creates at the facility receives a catalytic converter. The catalytic converters are purchased from their supplier, GESI which is a Canadian manufacturer that sell products in the United States.

TOUR INFORMATION

EPA Tour of the Facility: Yes

Data Collected and Observations: On the inspection EPA observed multiple metal fabrication stations (welder stations) with no air control, hooding, or ductwork above them. The welding stations utilize consumable and non-consumable electrode material. Metal certification data provided by SW indicated the consumable electrode material and filler material used with non-consumable electrodes contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal) and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal).

EPA toured some of the larger automated machines, most of which have built-in dust bags or dust trays. The dust bags and trays currently do not have any standard requirements to perform regular change outs; they are changed out when they are full. SW was able to supply change out frequency estimations. Most of the machines were not operating, due to the timing of EPA's inspection occurring at the end of the day. Some of the steel is cut and polished by hand. EPA observed a pipe cutting and grinding room where SW cut openings in the wall and installed box fans to ostensibly remove dust from that room. SW supplied EPA with material certification information for the flat and tube stainless steel. The information indicates the material contains cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal) and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal).

EPA inspected the wet and powder coat paint booths which are both uncontrolled. The powder booth is vented to the roof of the building, and the wet paint booth is not. SW also utilizes a burn off or curing oven, which is operated at 400°F for 10 minute cycles and has no control. The burn-off oven is vented through the roof of the building. SW supplied EPA with material certification information for the coatings used in the booths. The information indicates that the material does not contain cadmium, chromium, lead, or nickel in amounts greater than or equal to 0.1 percent by weight (as the metal) and contains manganese in amounts greater than or equal to 1.0 percent by weight (as the metal).

EPA inspected one catalytic converter that SW pulled from their parts storage area. The Converter part number was 4363 and labeled as a GEN2 catalyst. The substrate dimensions are 4.38"D x 3.5"L, 400 CPSI, 41g/cft @ 36/0/5, and had a stamped series # 43863 – EPA N/GBL/4363/1022. EPA confirmed that this product is registered with the EPA and complies to the aftermarket catalyst compliance testing requirements.

Photos and/or Videos: were taken during the inspection.

RECORDS REVIEW

1. EPA reviewed the Stainless Works, and Reaper Offroad catalog of current parts and accessories offered (year, make, and model) for each during the closing conference.

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility

Requested documents:

- Product catalog from GESI; highlight all catalytic converters by part number used by Stainless Works.
- GESI catalytic converter performance testing information and EPA certification for each converter.
- Documentation and supporting information that the emission related aspects of the replaced exhaust part meet or exceed the original equipment manufacturer specification. This includes engineering drawings or similar showing identical dimensions, materials, and design.
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- Stainless Works liability release/purchase order release associated with the purchase of an aftermarket exhaust.
- Laser tube machine, Lissmac De-Burr Machine, Flat Laser and Trump 30-30 Tray style machine dust collector change out and disposal records.
- SDS sheets for all coatings used in the middle powder coat spray booth and wet coat spray booth.
- Daily usage rates for both coating booths and confirmation of total cure-oven cycle time.
- Degreaser solvent SDS used in parts washer/ degreaser machine.
- Any information relating to State clean air inspections or discussions relating to an air permit.
- Confirmation of small business.
- Steel material certifications for every type of material used at the facility.
- Material certifications and purchase orders for all the consumable electrode purchase orders and filler rod purchase orders for 1 year.

Concerns: EPA raised concerns that some of the processes at the facility may be subject to federal regulations because of metal hazardous air pollution emissions.

DIGITAL SIGNATURES

Report Author: _____

Section Supervisor: _____ (Acting)

Facility Name: Stainless Works
Facility Location: 10145 Philipp Parkway
Date of Inspection: November 21, 2022

APPENDICES AND ATTACHMENTS

- 1.* Appendix A: Digital Image Log

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Brianna Fenzel	2. Archival Record Location: <u>https://usepa.sharepoint.com/:f:/r/sites/R5_Work/r5erc/ecad/A/ECAB%20Library/Enf_StainlessWorks_OH_22/Enf_StainlessWorks_</u>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	IMG_0298.JPG	2022:11:21 14:50:22	Cutting room vents
2	IMG_0299.JPG	2022:11:21 14:50:27	Cutting room floor dust
3	IMG_0300.JPG	2022:11:21 15:03:44	Wet Booth, powder booth, and cure oven
4	IMG_0301.JPG	2022:11:21 15:14:00	Gesi catalytic converter
5	IMG_0302.JPG	2022:11:21 15:14:11	Catalytic substrate